

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – ARIZONA**

**Meta's Position:** Meta proposed ~~to~~ for Arizona on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).<sup>1</sup>

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	<del>12/16/24 (Per 12/11 DMC)</del>	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas) <del>to start</del>	<del>12/9/24</del>	12/20/24
Deadline for first (or next) rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>12/6/24</del>	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>within 3 business days or providing proposed dates within 7 business days</del>	n/a	12/30/24
<del>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	n/a	<del>1/3/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25 1/31/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- <del>3/7/25 4/4/25</del>

pursuant to Section D of the Court's Standing Order for Discovery.

**Arizona's Position:** At this time, the four Arizona agencies still at issue (the Arizona Department of Education, Board of Education, Department of Child Safety, and Department of Health Services) are unable to commit to substantial completion of production of documents requested pursuant to Rule 34 by January 17, 2025, as Meta proposes. The Arizona Attorney General's Office has engaged a discovery vendor to work through technical resource staffing and other inherent constraints and limitations faced by Arizona agencies. Meta and Arizona are ORDERED have failed to reach agreement on search terms without further undue delay and the resultant universe of documents to be reviewed for production. Absent this information, the Arizona agencies have no basis to propose a schedule and will not make an empty promise to this Court regarding the timeline within which discovery can be completed.

---

<sup>1</sup> Per the Court's instructions, Meta includes no argument in response to the State's position. See Hrg Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

**SO ORDERED:**

**Meta's Position:** Meta proposed the following schedule to ~~for~~ California (including the California Executive Agencies) ~~on December 13, 2024~~. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).<sup>1</sup>

Date	Event
12/16/2024	Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached.
<del>12/18/2024</del>	<del>Deadline for first rolling production of state agency documents requested pursuant to Rule 34.</del>
12/18/2024	Deadline for Parties to complete meet and confers regarding search terms and custodians to be used for Rule 34 state agency discovery.
12/20/2024	Last date to file discovery letter briefs moving to compel productions regarding search terms and custodians for state agency discovery pursuant to Rule 34.
12/23/2024	First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>within 3 days or offering proposed dates within 7 days,</del>
<del>1/03/2025</del>	<del>Deadline for second (or to start next) rolling productions of state agency documents requested pursuant to Rule 34 (if not completed).</del>
<del>1/3/2025</del>	<del>Deadline for third (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed).</del>
<del>2/7/2025</del>	<del>Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34 (DMO 12).</del>
<del>2/10-2025-4/04/2025</del>	<del>Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties) (DMO 12).</del>

~~pursuant to Section D of the Court's Standing Order for Discovery.~~

**California Executive Agencies's Position:** Reserving all previous objections and arguments, including that they are not parties and have yet to be served with any Rule 45 subpoenas, the The Office of the Governor and nonparty state agencies ("nonparty agencies") ~~have been~~ shall continue negotiating with Meta in good faith. After Meta provided proposed search terms on December 9, the nonparty agencies provided Meta a preliminary report of hits on December 16, 2024. ~~Meta's sweeping search terms produced millions of hits, including over 2 million for the California Department of Public Health alone. A quick sampling reveals that the vast majority of documents sampled are nonresponsive or likely privileged, but because every document must be reviewed for privilege, the task will take months.~~ The nonparty agencies will meet and confer with Meta to put on hold the discovery for three agencies unlikely to produce relevant documents and to reduce and prioritize the search terms for the remaining four agencies. ~~The Parties are ORDERED to reach agreement on a final If Meta agrees to a significantly narrower set of search terms without further undue delay, that produces a dataset of 8,000-30,000 records per remaining agency by December 31, 2024, with smaller agencies at the lower end of that range, then it would be feasible for the agencies (depending on agency capacity, limited resources, and competing public priorities that they still must address) to review for privilege and responsiveness within the prescribed timeline, and The agencies would shall begin rolling production no later than January 3, 2025 10 with substantial completion by February 7 14, 2025.~~

<sup>1</sup> Per the Court's instructions, Meta includes no argument in response to the State's position. See Hrg Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

### SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – CALIFORNIA

**Meta's Position:** Meta proposed The following schedule for to California on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

<b>Event</b>	<b>DMO 12</b>	<b>Meta Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/2/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/9/24	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	12/6/24	12/27/24
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of the Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline <del>to start</del> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25 1/6/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25 2/3/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25 3/7/25	2/3/25 2/4/25- 3/7/25 4/4/25

SO ORDERED for:

**Certain California Agencies's Position:** California Health and Human Services Agency (CalHHS), Department of Health Care Services (DHCS), Mental Health Services Oversight and Accountability Commission (MHSOAC)

<b>Date</b>	<b>Event</b>
December 18, 2024	Deadline to agree on search terms and custodians for CalHHS and MHSOAC
December 20, 2024 <del>6</del>	Deadline to agree on search terms and custodians, or alternative collection and review plan, for DHCS. <del>Further deadlines for DHCS are contingent upon agreement to a hit count that is broadly consistent with the hit count of the proposal at ECF 1430-2 at 14-15.</del>
January <del>10</del> , 2025	Deadline for rolling document productions to begin
February <del>7</del> , 2025 <del>3</del>	Deadline for substantial completion of document productions
February 14, 2025	Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)
February 21, 2025	Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions
April 4, 2025	Deadline for Meta to complete all depositions

## SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – COLORADO

**Meta's Position:** Meta proposed The following schedule to ~~for~~ Colorado on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>per Section D of the Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline <del>to start</del> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del> <del>2/3/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	<del>2/3/25</del> <del>2/4/25</del> <del>3/7/25</del> <del>4/4/25</del>

SO ORDERED for:

**Colorado's Position:** Colorado Governor's Office, BHA, CDHS, CDHE, OSPB, and CDE

Date	Event
December 13, 2024	Meta provided 85 revised search strings to accommodate previously disclosed technical limitations of Colorado agencies.
December 16, 2024	Colorado agencies began running revised search strings.
December 20, 2024	Hit reports for Colorado agencies* will be provided.
January 6, 2025	Complete negotiations of final search terms for production based on hit reports.
January 13, 2025	Rolling production to begin on finalized search terms. <del>If Parties SHALL fail to agree on search terms without further undue delay, Colorado will initiate additional hit reports and production on final Colorado proposal to ensure production can proceed as needed.</del>
February 7, 2025 3	Substantial completion of production for State AG and state agency documents <del>pursuant to Colorado counterproposal</del>
February 14, 2025	Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)
February 21, 2025	Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions
April 4, 2025	Deadline for Meta to complete all depositions

\*CDHE may require minimal additional time due to IT staffing issues. Counsel ~~SHALL~~ will keep Meta informed of this agency's progress.

SO ORDERED:

## SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – CONNECTICUT

**Meta's Position:** Meta proposed ~~The following schedule for to Connecticut on December 17, 2024.~~ All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of the Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<del>1/3/25 1/6/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	<del>2/3/25-3/7/25 4/4/25</del>

**Connecticut's Position:**

Agency	Search Term Finalization Date*:	First Custodian Production Date (or Rolling Production to Begin):	Substantial Completion Date* (all docs):
CT Office of the Governor	12/20/24	<del>1/10/25 1/06/25</del>	1/17/25
CT Department of Children and Families	12/20/24 (targeted search process finalization)	<del>1/10/25 1/06/25</del>	1/17/25
CT Department of Education	12/20/24	<del>1/10/25 1/06/25</del>	1/17/25
CT Commission for Educational Technology	N/A	Rule 45 Subpoena Completion on 10/9/24**	<del>N/A 1/17/25 as to any cleanup productions</del>

\*This date represents the latest date for the identified agency to commence the review and production process.

The ~~Parties SHALL agree on a final agency will work off its proposed~~ search term list ~~without further undue delay unless an alternative agreement with Meta is reached or a Court order requiring alternative terms issues.~~

\*This Substantial Completion Date does not include responses to Meta's Third Request for Production of Documents, dated November 18, 2024. ~~The parties each reserve all rights with respect to the deadline for substantially completing production in response to Meta's Third Request for Production of Documents.~~

\*\*By 1/3/25, counsel SHALL serve an updated response to the subpoena certifying under Rule 11 all bases for assertion that production is complete, unless the Parties agree otherwise.

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – DELAWARE<sup>2</sup>**

**Meta's Position:** Meta proposed ~~to~~ for Delaware on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of this Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline <del>to start</del> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<del>1/3/25</del> 1/6/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del> 2/3/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	<del>2/3/25</del> 2/4/25- <del>3/7/25</del> 4/4/25

**Delaware's Position:** Delaware proposed ~~to~~ Meta on December 16, 2024.

Date	Event
12/23/2024	Deadline to complete meet and confers regarding search terms for Delaware agencies.
<del>1/8/2024</del> <del>1/6/2025</del>	Delaware agencies to begin second round of rolling productions.
<del>2/6/2025</del> <del>2/3/2025</del>	Substantial completion of production for Delaware agencies. <sup>3</sup>

<sup>2</sup> Per the Court's instructions, the parties include no argument. See Hrg Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

<sup>3</sup> Assuming The Parties SHALL reach final agreement on a reasonable set of search terms without further undue delay.

## SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – HAWAII

**Meta's Position:** Meta proposed ~~SO ORDERED~~ The following schedule to ~~for Hawaii on December 17, 2024~~. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

<b>Event</b>	<b>DMO 12</b>	<b>Meta Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of the Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline <del>to start</del> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<del>1/3/25</del> <del>1/6/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del> <del>2/7/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	<del>2/3/25</del> <del>2/10/25</del> <del>3/7/25</del> <del>4/4/25</del>

**Hawaii's Position:** ~~Hawaii's Proposed Discovery Schedule for State Agency Production~~

<b>Date</b>	<b>Event</b>
12/31/2024	Deadline for Parties to complete meet and confers regarding remaining search terms to be used for Rule 34 state agency discovery
<del>1/10/2025 1/6/2025</del>	Hawai‘i agencies to begin next round of rolling productions.
<del>2/28/2025 2/7/2025</del>	Substantial completion of production for Hawai‘i agencies.

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – ILLINOIS**

~~Meta's Position:~~ Meta proposed The following schedule to for Illinois on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	<del>DMO 12</del>	<del>Meta Proposal</del>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of this Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<del>1/3/25</del> <b>1/6/25</b>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del> <b>1/31/25</b>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	2/3/25- <del>3/7/25</del> <b>4/4/25</b>

~~Illinois's Position: Illinois Attorney General, Governor's Office, DHS, DCFS, ISBE, and IDPH~~

Date	Event
December 13, 2024	Illinois provided search term and custodian counterproposal for all state agencies
December 16, 2024	Illinois began export of custodial mailboxes
<del>ASAP TBD after full custodial mailboxes</del> <del>SHALL be have been</del> exported and processed into eDiscovery platform	<del>If The Parties SHALL fail to agree on search terms and custodians, without further undue delay. Illinois will produce additional hit reports from eDiscovery platform when custodial mailboxes loaded. Illinois will begin document review and production based on agreed search terms final Illinois counterproposal.</del>
January 6 <del>10</del> , 2025	Last day for rolling document productions to begin
February 7, 2025 <del>January 31, 2025</del>	Substantial completion of production for State AG and state agency documents <del>pursuant to Illinois counterproposal</del>
February 14, 2025	Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)
February 21, 2025	Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions
April 4, 2025	Deadline for Meta to complete all depositions

### SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – INDIANA

Meta's Position: Meta proposed The following schedule to for Indiana on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition pursuant to Section D of this Court's Standing Order for Discovery.	n/a	12/30/24
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<del>1/3/25</del> <del>1/6/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del> <del>1/31/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	2/3/25- <del>3/7/25</del> <del>3/14/25</del>

Indiana's Position:

Date	Event
December 23, 2024	Deadline for Parties to complete meet and confers regarding search terms to be used for Rule 34 state agency discovery
January 8, 2025	Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions
January 6 <del>10</del> , 2025	Start date for rolling productions of state agency custodian documents requested pursuant to Rule 34
February 7, 2025 <del>January 31, 2025</del>	Substantial completion of production for State AG and state agency documents
February 3 <del>14</del> , 2025, through March 14, 2025	Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – KANSAS**

<b>Event</b>	<b>DMO 12</b>	<b>Meta Proposal</b>	<b>Kansas Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24	<del>12/23/24</del>
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24	
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	2/7/25 (concurrent with Rule 34 deadline)
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>	<del>Strike this</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition pursuant to Section D of this Court's Standing Order for Discovery.	n/a	12/30/24	
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<del>1/3/25</del> <del>1/6/25</del>	<del>1/10/25</del> <del>1/6/25</del>
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (and to meet and confer re: any such disputes)	<del>1/6/25</del>	<del>1/6/25</del> <del>1/7/25</del>	<del>1/8/25</del> <del>1/7/25</del>
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del>	<del>2/7/25</del> <del>1/31/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	2/3/25- <del>3/7/25</del> <del>4/4/25</del>	
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (and to meet and confer re: any such disputes)	2/14/25	2/14/25	
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – KENTUCKY**

<b>Event</b>	<b>DMO 12</b>	<b>Meta Proposal</b>	<b>Kentucky Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24	12/20/24
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	12/23/24
Deadline <b>to start</b> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	12/6/24	12/27/24	1/10/25
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <b>pursuant to Section D of this Court's Standing Order for Discovery.</b>	n/a	12/30/24	<del>12/30/24, but 2/14/25 (per DMO 12) for deadline to object to said depositions.</del>
<del>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	n/a	<del>1/3/25</del>	n/a
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions ( <i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/6/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del>	<del>2/7/25 1/31/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – LOUISIANA**

<b>Event</b>	<del>DMO 12</del>	<del>Meta Proposal</del>	<b>Louisiana Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24	<del>12/23/24</del>
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24	12/20/24
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	12/23/24
Deadline <b>to start</b> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>12/6/24</del>	<del>12/27/24</del>	<del>1/10/25</del> <b>1/3/25</b>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <b>pursuant to Section D of this Court's Standing Order for Discovery.</b>	n/a	12/30/24	<del>1/6/25</del>
<del>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	n/a	<del>1/3/25</del>	<del>1/3/25</del>
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions ( <i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/6/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del>	<del>1/31/25</del> <b>1/24/25</b>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

## SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – MAINE

**Meta's Position:** Meta proposed ~~the following schedule to~~ for Maine on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

<b>Event</b>	<b>DMO 12</b>	<b>Meta Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of this Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline <del>to start</del> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<del>1/3/25</del> <del>1/6/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del> <del>2/7/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	<del>2/3/25</del> - <del>2/10/25</del> 3/7/25

**Maine's Position:** Maine proposes ~~the following schedule for completion of state agency discovery. This proposal applies to the Department of Administrative and Financial Services, Department of Education, Department of Health and Human Services, and the Governor's Office.~~ Meta has agreed to de-prioritize discovery from the Department of Economic and Community Development.

Date	Task
December 18 23, 2024	Complete meet and confers on search terms and custodians
December 20 30, 2024	Deadline for letter briefs on search terms and custodians
January 6 10, 2025	Deadline to begin rolling productions
February 7 14, 2025	Deadline for substantial completion of production
February 10 28, 2025	Earliest date for 30(b)(6) deposition

## SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – MICHIGAN

**Meta's Position:** Meta proposed ~~the following schedule to~~ for Michigan on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of this Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline <del>to start</del> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25 1/31/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	<del>2/3/25-</del> <del>3/7/25 4/4/25</del>

The Parties are ORDERED to reach final, reasonable,

**Michigan's Position:** Michigan's proposal below is contingent on Meta's acceptance of outstanding, good-faith proposal for ~~agreement on~~ search terms dated December 18, 2024, and requests to de-prioritize certain agencies.

Date	Event
<del>ASAP finalize TBD failing agreement on search terms and custodians</del>	As necessary, Michigan will produce additional hit reports from eDiscovery platform when available. <del>The Parties shall reach agreement without further undue delay on Once Meta confirms acceptance of Michigan's final search terms.</del> proposal, Michigan will promptly begin document review and production.
January <del>3 17</del> , 2025	Last day for rolling document productions to begin
January 31, 2025 February 7, 2025	Substantial completion of production for State AG and state agency documents <del>pursuant to Michigan counterproposal</del>
February 14, 2025	Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)
February 21, 2025	Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions
April 4, 2025	Deadline for Meta to complete all depositions

### SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – MINNESOTA

~~Meta's Position:~~ Meta proposed ~~the following schedule to~~ for Minnesota on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).<sup>4</sup>

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of this Court's Standing Order for Discovery.</del>	n/a	12/30/24
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25 1/31/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	<del>2/3/25-</del> <del>3/7/25 4/4/25</del>

~~Minnesota's Position:~~ DHS, MDE, and the Governor's Office sent Meta counterproposals accompanied by hit reports and explanations for the same. Meta responded the day of this filing, and the negotiations are ongoing as to DHS and MDE. The Governor's Office accepted Meta's 12/18/24 counterproposal. Accordingly, the MN AGO, on behalf of DHS, MDE, and the Governor's Office, propose the following deadlines to complete state agency discovery:

<b>12/20/24</b>	<b>Search Term Finalization Date.</b> This date represents the latest date for DHS, MDE, and the Governor's Office to commence the review and production process. The Parties SHALL finalize agreement on a agency will work from its proposed search term list without further undue delay unless an alternative agreement with Meta is reached or a Court order requiring alternative terms issues.
<b>1/31/25</b>	<b>Rolling Production to Begin.</b>
<b>2/7/25</b> <b>1/31/25</b>	<b>Substantial Completion Date.</b> DHS cannot currently evaluate the adequacy of this date due to ongoing search term negotiations. DHS, MDE, and the Governor's Office reserve all rights to seek relief from this deadline if The parties SHALL do not reach agreement on reasonable search terms without further undue delay.

~~MN AGO objects to Meta's proposed schedule to the extent that it would impose different deadlines on agencies not at issue for purposes of this submission or includes its third set of requests for production. MN AGO further objects to Meta's proposed deposition schedule. MN AGO cannot meaningfully negotiate deposition deadlines until the scope of the agencies' search and production is finalized. Meta's proposed deposition schedule is also duplicative (e.g., Meta's 12/30/24 deadline is duplicative of deadlines in DMO 12) and serves only to impose burdensome and unnecessary obligations on the States, and should not be adopted.~~

<sup>4</sup> Per the Court's instructions, Meta includes no argument in response to the State's position. See Hrg Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

~~SO ORDERED:~~**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – MISSOURI**

**Meta's Position:** Meta proposed ~~the following schedule to~~ for Missouri on December 17, 2024, and did not receive any proposed dates from Missouri.

<b>Event</b>	<b>DMO 12</b>	<b>Meta Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/6/24</del>	<del>12/27/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <b>pursuant to Section D of this Court's Standing Order for Discovery.</b>	n/a	12/30/24
Deadline <b>to start</b> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	1/3/25
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions ( <i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	1/17/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25-3/7/25	2/3/25-3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25

**SCHE**DU**E FOR COMPLETION OF STATE AG DISCOVERY – NEBRASKA**

**Meta's Position:** Meta proposed The following schedule to for Nebraska on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).<sup>5</sup>

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<u>12/2/24</u>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<u>12/9/24</u>	12/20/24
<u>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</u>	<u>12/6/24</u>	<u>12/27/24</u>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition pursuant to Section D of this Court's Standing Order for Discovery.	n/a	12/30/24
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<u>1/3/25</u> <u>1/6/25</u>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<u>1/10/25</u>	<u>1/17/25</u> <u>1/14/25-Governor</u> <u>2/7/25-other agencies</u>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	<u>2/3/25</u> <u>2/10/25</u> <u>3/7/25</u> <u>4/4/25</u>

**Nebraska's Position:** Nebraska's state agencies did not have infrastructure to run hit searches previously. Nebraska is working with state IT personnel to build and develop search functionality for some databases and working on alternative solutions for searching certain databases that present additional technical challenges. Some agencies are alternatively providing methodologies for manual searches. Nebraska has proposed the below compliance deadlines for the Department of Education, the Children's Commission, and the Governor's Office are ORDERED.<sup>6</sup> The Department of Health and Human Services is not included DHHS already has fully complied with Meta's requests. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Date	Event
December 16, 2024	Nebraska provided available hit reports
January 3, 2025	Department of Education to begin exporting and processing documents.
January 10, 2025	Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (and to meet and confer re: any such disputes)
January 14, 2025	Substantial Compliance from the Nebraska Governor's Office, including disclosures of the search process
January 6 31, 2025	Rolling Production to begin for the Department of Education and the Children's Commission pursuant to Nebraska's counterproposal
February 7 28, 2025	Substantial Compliance from the Department of Education and the Children's Commission pursuant to Nebraska's counterproposal

<sup>5</sup> Per the Court's instructions, Meta includes no argument in response to the State's position. See Hrg Tr. at 103:4-6 (Dec. 11, 2024) ("It's just a schedule. I don't want argument.").

<sup>6</sup> Assuming the Parties' agreement on search terms. If the Parties are unable to reach an agreement on search terms, Nebraska will begin document review and production based on the final Nebraska counterproposal.

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – NEW JERSEY**

<b>Event</b>	<b>DMO 12</b>	<b>Meta Proposal</b>	<b>New Jersey Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24	<del>12/27/24</del>
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24	<del>1/6/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	<del>12/23/24</del>	12/23/24	<del>n/a, covered by R34 prod.</del>
Deadline <b>to start</b> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>12/6/24</del>	<del>12/27/24</del>	<del>1/15/25 1/6/25</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <b>pursuant to Section D of this Court's Standing Order for Discovery.</b>	n/a	12/30/24	12/30/25
<b>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</b>	n/a	<del>1/3/25</del>	<del>2/5/25</del>
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions ( <i>and</i> to meet and confer re: any such disputes)	<del>1/6/25</del>	<del>1/6/25</del>	<del>1/13/25 1/10/25</del>
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	<del>1/13/25</del>	<del>1/13/25</del>	<del>1/20/25 1/17/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del>	<del>2/28/25 2/7/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – NEW YORK**

~~Meta's Position:~~ Meta proposed ~~the following schedule to~~ for New York on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>12/6/24</del>	<del>12/27/24</del> <del>12/30/24</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition pursuant to Section D of this Court's Standing Order for Discovery.	n/a	12/30/24
<del>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	n/a	<del>1/3/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del> <del>1/31/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25

~~New York's Position:~~ While the New York agencies all maintain their objections and stand by their legal positions (see, e.g., Dkt. No. 1443), with the exception of one agency that has been deprioritized. All of the New York agencies identified in the Rule 34 subpoena issued by Meta have agreed to produce documents pursuant to Rule 45. These include, the Council on Children and Families, the Department of Education, the Department of Health, the Department of State, the Office of Children and Family Services, the Office of Mental Health, the Division of the Budget and the Office of the Governor. The proposal from OAG set forth below is an estimate based on a review of the document hits generated by the most recent proposals from the New York agencies and not the hits generated by Meta's most recent terms.

Date	Event
<del>12/23/2024</del> <del>12/18/2024</del>	Deadline to complete meet and confers regarding search terms and custodians for New York agencies.
<del>12/27/2024</del> <del>12/20/2024</del>	Letter briefs on search terms and custodians for New York agencies (if necessary).
12/30/2024	New York agencies to begin next round of rolling productions.
<del>2/14/2025</del> <del>1/31/2025</del>	Substantial completion of production for New York agencies.
<del>2/3/2025</del> <del>2/28/2025</del> – 3/7/2025	Dates for Rule 30(b)(6) depositions of New York agencies to be taken (unless otherwise agreed upon by the Parties).

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – NORTH CAROLINA**

**Meta's Position:** Meta proposed The following schedule to for North Carolina on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24 & see below
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>12/6/24</del>	12/27/24 1/6/25-Governor/DPI 1/10/25-DHHS
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition pursuant to Section D of this Court's Standing Order for Discovery.	n/a	12/30/24
Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)	n/a	<del>1/3/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	1/17/25 1/22/25-Governor/DPI 1/24/25-DHHS
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25

**North Carolina's Position:** North Carolina proposes the below schedule:

Date	Event(s)
Jan. 3, 2025 <del>Dec. 31, 2024</del>	Completion of conferrals re: search terms and custodians for DPI covering the period 1/1/12 to 12/31/16. <sup>7</sup>
Jan. 8, 2025	Deadline for conferrals re: scheduling AG and agency 30(b)(6) depositions.
Jan. 10, 2025	Rolling production begins for DPI documents for the period 1/1/17 to 3/28/24, and Governor's Office documents.
Jan. 13, 2025	Deadline for letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions.
Jan. 17, 2025	Rolling production to begin for any DPI documents for the period 1/1/12 to 12/31/16, and DHHS documents for the time period 1/1/2017 to 3/28/2024
<del>Jan. 3, 2025</del>	Completion of conferrals regarding any search terms and custodians for DHHS for the period of 1/1/12 to 12/31/16.
Jan. 22, 2025	Substantial completion of production for documents from the Governor's Office, and for DPI documents for the time period 1/1/17 to 3/28/24.
Jan. 24, 2025	Substantial completion for DHHS dating 1/1/17 to 3/28/24, and any DPI documents dating 1/1/12 to 12/31/16.
<del>Jan. 24</del> Feb. 14, 2025	Substantial completion for any DHHS documents dating 1/1/12 to 12/31/16.
Feb. 14, 2025	Deadline for Meta to serve fact witness depositions.
March 14, 2025	Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions.

<sup>7</sup> NCAG SHALL maintain its objection to the propriety of this earlier time period but is willing to continue conferrals.

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – OHIO**

Event	DMO 12	Meta Proposal	Ohio Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24	<del>12/30/24</del>
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24	<del>1/6/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	12/23/24
Deadline <b>to start</b> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>12/6/24</del>	<del>12/27/24</del>	<del>1/10/25</del> <b>1/3/25</b>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <b>pursuant to Section D of this Court's Standing Order for Discovery.</b>	n/a	12/30/24	<del>1/6/25</del>
<b>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</b>	n/a	<del>1/3/25</del>	n/a
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions ( <i>and</i> to meet and confer re: any such disputes)	<del>1/6/25</del>	<del>1/6/25</del>	<del>1/17/25</del> <b>1/10/25</b>
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	<del>1/13/25</del>	<del>1/13/25</del>	<del>1/24/25</del> <b>1/20/25</b>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del>	<del>2/7/25</del> <b>1/31/25</b>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – PENNSYLVANIA**

<b>Event</b>	<b>DMO 12</b>	<b>Meta Proposal</b>	<b>Pennsylvania Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24	<del>1/3/25</del>
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24	<del>1/10/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	12/23/24	12/23/24	12/23/24
Deadline <b>to start</b> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>12/6/24</del>	<del>12/27/24</del>	<del>1/31/25</del> <b>1/17/25</b>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <b>pursuant to Section D of this Court's Standing Order for Discovery.</b>	n/a	12/30/24	12/30/24
<b>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</b>	n/a	<del>1/3/25</del>	<del>2/14/25</del>
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions ( <i>and</i> to meet and confer re: any such disputes)	<del>1/6/25</del>	<del>1/6/25</del>	<del>1/13/25</del> <b>1/10/25</b>
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	<del>1/13/25</del>	<del>1/13/25</del>	<del>1/20/25</del> <b>1/17/25</b>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del>	<del>2/28/25</del> <b>2/7/25</b>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – RHODE ISLAND**

**Meta's Position:** Meta proposed The following schedule to ~~for~~ Rhode Island ~~on~~ December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	<del>DMO 12</del>	<del>Meta Proposal</del>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24
Deadline <del>to start</del> next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>12/6/24</del>	<del>12/27/24 1/3/25</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of this Court's Standing Order for Discovery.</del>	n/a	12/30/24
<del>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	n/a	<del>1/3/25</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	1/10/25	<del>1/17/25 2/7/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del>	<del>2/3/25 2/10/25</del> <del>3/7/25 4/4/25</del>

**Rhode Island's Proposal:**

Date	Event
12/20/2024	Expected completion for conferrals regarding agency custodians and ESI search terms
<del>1/8/2024</del> <del>1/3/2025</del>	Rhode Island agencies to begin rolling productions.
2/26/2025 <del>2/7/2025</del>	Substantial completion for agency productions <sup>8</sup>
3/5/2025	Deadline to notice agency depositions
4/4/2025	Deadline for Meta to complete agency depositions

<sup>8</sup> This proposed substantial completion deadline assumes the parties and agencies can reach an agreement regarding custodians and search terms by December 20, 2024.

The Parties and agencies SHALL reach agreement regarding custodians and search terms without further undue delay.

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – SOUTH DAKOTA**

**Meta's Position:** Meta proposed The following schedule to for South Dakota on December 17, 2024. All other dates would be the same as set by the Court on November 26, 2024. DMO 12 (ECF No. 1380).

Event	DMO 12	Meta Proposal
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24
Deadline for completion of conferrals re: Rule 34 state agency discovery	<u>12/2/24</u>	12/18/24
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<u>12/9/24</u>	12/20/24
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<u>12/6/24</u>	<u>12/27/24</u> <u>1/6/25</u>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition pursuant to Section D of this Court's Standing Order for Discovery.	n/a	12/30/24
<del>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	n/a	<u>1/3/25</u>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<u>1/10/25</u>	<u>1/17/25</u> <u>2/10/25-DSS</u> <u>2/3/25-all other agencies</u>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<u>2/3/25</u> <u>3/7/25</u>	<u>2/3/25</u> <u>2/4/25</u> 3/7/25

**South Dakota's Position:**

Agency	Search Term Negotiation Status:	Search Term Finalization Date*:	Rolling Production to Begin:	Substantial Completion Date (all docs):
AG	Partially Agree	12/31/24	<u>01/10/25</u> <u>1/6/25</u>	<u>02/14/25</u> <u>2/3/25</u>
BOR	Partially Agree	12/31/24	<u>01/10/25</u> <u>1/6/25</u>	<u>02/14/25</u> <u>2/3/25</u>
DOH	Partially Agree	12/31/24	11/4/24	<u>02/14/25</u> <u>2/3/25</u>
DOE	Partially Agree	12/31/24	<u>01/10/25</u> <u>1/6/25</u>	<u>02/14/25</u> <u>2/3/25</u>
DSS	Partially Agree	12/31/24	<u>01/10/25</u> <u>1/6/25</u>	<u>03/31/25</u> <u>2/10/25</u>
GO	Partially Agree	12/31/24	<u>01/10/25</u> <u>1/6/25</u>	<u>02/14/25</u> <u>2/3/25</u>
BFM	Partially Agree	12/31/24	<u>01/10/25</u> <u>1/6/25</u>	<u>02/14/25</u> <u>2/3/25</u>

The Parties are ORDERED to finalize agreement on search terms without any further undue delay.

**SCHEDULE FOR COMPLETION OF STATE AG DISCOVERY – WASHINGTON**

<b>Event</b>	<b>Meta Proposal</b>	<b>Washington Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	n/a
Deadline for completion of conferrals re: Rule 34 state agency discovery	12/18/24 (DMO 12: 12/2/24)	n/a. Parties have met & conferred.
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	12/20/24 (DMO 12: 12/9/24)	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	<del>12/23/24</del> <del>(Per DMO 12)</del>	<del>2/10/25</del> 1/6/25
<del>Deadline for first (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	<del>12/27/24</del> <del>(DMO 12: 12/6/24)</del>	<del>No objection.</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition pursuant to Section D of this Court's Standing Order for Discovery.	12/30/24	No objection. <del>Subject to future negotiations.</del>
Deadline to start next rolling productions of state agency documents requested pursuant to Rule 34 (if not completed)	<del>1/3/25</del>	<del>1/10/25</del> 1/8/25
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions (and to meet and confer re: any such disputes)	<del>1/6/25</del> <del>(Per DMO 12)</del>	<del>2/14/25</del> 2/3/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	<del>1/13/25</del> <del>(Per DMO 12)</del>	<del>2/19/25</del> 2/7/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/17/25</del> <del>(DMO 12: 1/10/25)</del>	<del>2/10/25</del> 1/31/25
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	<del>2/3/25</del> <del>3/7/25</del> <del>(Per DMO 12)</del>	<del>2/24/25</del> 2/3/25- 3/17/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions (and to meet and confer re: any such disputes)	2/14/25 (Per DMO 12)	No objection. <del>Subject to future negotiations and production status.</del>
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25 (Per DMO 12)	No objection. <del>Subject to future negotiations and production status.</del>
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25 (Per DMO 12)	No objection. <del>Subject to future negotiations</del>
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25 (Per DMO 12)	No objection. <del>Subject to future negotiations and production status.</del>

**SCHEDULE FOR COMPLETION OF STATE AGENCY DISCOVERY – WISCONSIN**

<b>Event</b>	<del>DMO 12</del>	<del>Meta Proposal</del>	<b>Wisconsin Proposal</b>
Deadline for states to provide hit reports for most recent Meta search term and agency custodians proposal if no agreement reached	12/16/24 (Per 12/11 DMC)	12/16/24	<del>WI objects to inclusion of this entry</del>
Deadline for completion of conferrals re: Rule 34 state agency discovery	<del>12/2/24</del>	12/18/24	<del>12/20/24</del>
Last date to file discovery letter briefs re: disputes concerning production of state agency documents (Rule 34 requests or subpoenas)	<del>12/9/24</del>	12/20/24	<del>WI objects to inclusion of this entry</del>
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 45 subpoenas	<del>12/23/24</del>	<del>12/23/24</del> <del>12/31/24</del>	<del>WI objects to inclusion of this entry</del>
Deadline <del>to start</del> next rolling productions of state agency documents requested pursuant to Rule 34	n/a	<del>12/27/24</del>	<del>1/10/25</del> <del>1/3/25</del>
First date for Meta to notice fact deponents from individual agencies, with States objecting to any deposition <del>pursuant to Section D of this Court's Standing Order for Discovery.</del>	n/a	12/30/24	<del>WI objects to inclusion of this entry</del>
<del>Deadline for second (or next) rolling production of state agency documents requested pursuant to Rule 34 (if not completed)</del>	n/a	<del>1/3/25</del>	<del>WI objects to inclusion of this entry</del>
Last date for Parties to meet and confer re: scheduling of State AG and state agency Rule 30(b)(6) depositions ( <i>and</i> to meet and confer re: any such disputes)	1/6/25	1/6/25	1/6/25
Last date to file discovery letter briefs re: disputes concerning scheduling or taking of any State AG and state agency Rule 30(b)(6) depositions	1/13/25	1/13/25	1/13/25
Substantial completion of production for State AG and state agency documents requested pursuant to Rule 34	<del>1/10/25</del>	<del>1/17/25</del>	<del>2/7/25</del> <del>1/31/25</del>
Dates for Rule 30(b)(6) depositions of State AGs and state agencies to be taken (unless otherwise agreed upon by the Parties)	2/3/25- 3/7/25	2/3/25- 3/7/25	2/3/25- 3/7/25
Deadline for Parties to meet and confer to identify and commence scheduling State AG and state agency individual fact witness depositions ( <i>and</i> to meet and confer re: any such disputes)	2/14/25	2/14/25	2/14/25
Deadline for Meta to serve deposition notices for State AG and state agency individual fact witness depositions	2/21/25	2/21/25	2/21/25
Last date to file discovery letter briefs re: any disputes concerning scheduling or taking of State AG and state agency fact witness depositions	2/21/25	2/21/25	2/21/25
Deadline for Meta to complete depositions of State AG and state agency fact witnesses	4/4/25	4/4/25	4/4/25